

# EXHIBIT A

## Stuart Davidson

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**From:** Robert W. Frank <RFrank@neil-dymott.com>  
**Sent:** Thursday, January 05, 2017 11:07 AM  
**To:** Bill Sinclair; Rachel Jensen  
**Subject:** RE: Dr. Chao

This will need to take place on 1-26 in my office, that was one of the dates we discussed. It's the only one that will work this month. How long, couple hours or....?

I will get you authority applicable to paying for his professional time.

Robert Frank

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**From:** Bill Sinclair [<mailto:bsinclair@mdattorney.com>]  
**Sent:** Wednesday, January 04, 2017 5:20 PM  
**To:** [rjensen@rgrdlaw.com](mailto:rjensen@rgrdlaw.com); Robert W. Frank <[RFrank@neil-dymott.com](mailto:RFrank@neil-dymott.com)>  
**Subject:** Dr. Chao  
**Importance:** High

Bob,

Meet Rachel. Vice versa.

Rachel will be taking Dr. Chao's deposition in San Diego. Bob, please coordinate with her to nail down a date and time. I believe January 24 and 25 were tossed around. Regardless, we'd like to get this done before February 3. As Dr. Chao has been aware of this since early November, that should not pose a problem.

Bob, I know you wanted to talk to us about the scope of the deposition. At this point, all we can say is that our focus is on Dr. Chao's time with the Chargers. Also, you asked if we would pay for his time. I told you I am not aware of our obligation to do so; if you point me to some authority that says otherwise, I'm happy to consider it. If you want to discuss either or both issues, let us know a time to talk.

Best,

**Bill Sinclair**

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